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4 Hon. David G. Estudillo  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

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TOMMY BROWN, on their own behalf and  
on behalf of other similarly situated persons,

Plaintiff,

vs.

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TRANSWORLD SYSTEMS, INC.,  
PATENAUDA & FELIX, APC; U.S. BANK,  
NA. NATIONAL COLLEGIATE STUDENT  
LOAN TRUST 2004-1, NATIONAL  
COLLEGIATE STUDENT LOAN TRUST  
2004-2, NATIONAL COLLEGIATE  
STUDENT LOAN TRUST 2005-1,  
NATIONAL COLLEGIATE STUDENT  
LOAN TRUST 2005-2, NATIONAL  
COLLEGIATE STUDENT LOAN TRUST  
2005-3, NATIONAL COLLEGIATE  
STUDENT LOAN TRUST 2006-1,  
NATIONAL COLLEGIATE STUDENT  
LOAN TRUST 2006-2, NATIONAL  
COLLEGIATE STUDENT LOAN TRUST  
2007-1, and NATIONAL COLLEGIATE  
STUDENT LOAN TRUST 2007-2,

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Defendants.

No. 2:20-cv-00680-DGE

DECLARATION REQUESTING  
JUDICIAL NOTICE

Marc Rosenberg states and declares as follows:

1. I am an attorney for defendant Patenaude & Felix, APC. I am competent to  
testify, and do so from personal knowledge.

DECLARATION REQUESTING JUDICIAL NOTICE - 1  
2:20-cv-00680-DGE  
6940818.doc



701 Pike Street, Suite 1800  
Seattle, Washington 98101  
206.624.7990 · [www.leesmart.com](http://www.leesmart.com)

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2. Pursuant to Fed.R.Evid. 201, I request that this Court take judicial notice of the  
3 attached documents, which are on file with King County Superior Court in the underlying  
4 lawsuit *National Collegiate Student Loan Trust 2007-2 v. Brown*, King County Superior Court  
cause no. 19-2-09402-8-KNT.

5  
3. The attached exhibits are true and correct copies of the originals.

6 **Exhibit 1.** Affidavit of Bradley Luke

7 **Exhibit 2.** Order on Summary Judgment

8 I declare under the penalty of perjury under the laws of the State of Washington that the  
9 foregoing is true and correct to the best of my knowledge.

10 DATED this 1st day of March, 2022.

11 LEE SMART, P.S., INC.

12 By: s/ Marc Rosenberg  
13 Marc Rosenberg, WSBA No. 31034  
14 Of Attorneys for Defendant  
Patenaude & Felix, APC

15 1800 One Convention Place  
16 701 Pike Street  
17 Seattle, WA 98101-3929  
(206) 624-7990  
[mr@leesmart.com](mailto:mr@leesmart.com)

## **CERTIFICATE OF SERVICE**

I hereby certify that on the date provided at the signature below, I electronically filed the preceding document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following individual(s):

|                    |  |
|--------------------|--|
| Christina Henry    | <a href="mailto:chenry@hdm-legal.com">chenry@hdm-legal.com</a>                 |
| Phillip Robinson   | <a href="mailto:phillip@marylandconsumer.com">phillip@marylandconsumer.com</a> |
| Scott C. Borison   | <a href="mailto:scott@borisonfirm.com">scott@borisonfirm.com</a>               |
| Bradley St. Angelo | <a href="mailto:bstangelo@session.legal">bstangelo@session.legal</a>           |
| Bryan C. Shartle   | <a href="mailto:bshartle@sessions.legal">bshartle@sessions.legal</a>           |
| Justin Homes       | <a href="mailto:jhomes@sessions.legal">jhomes@sessions.legal</a>               |
| Emily Harris       | <a href="mailto:eharris@corrchronin.com">eharris@corrchronin.com</a>           |
| Benjamin C. Byers  | <a href="mailto:bbyers@corrchronin.com">bbyers@corrchronin.com</a>             |
| Albert J. Rota     | <a href="mailto:ajrota@jonesday.com">ajrota@jonesday.com</a>                   |
| Kristine E. Kruger | <a href="mailto:kkruger@perkinscoie.com">kkruger@perkinscoie.com</a>           |
| Thomas N. Abbott   | <a href="mailto:tabbott@perkinscoie.com">tabbott@perkinscoie.com</a>           |

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Respectfully submitted this 1st day of March, 2022.

## LEE SMART, P.S., INC.

By: s/ Marc Rosenberg  
Marc Rosenberg, WSB No. 31034  
Of Attorneys for Defendant  
Patenaude & Felix, APC

1800 One Convention Place  
701 Pike Street  
Seattle, WA 98101-3929  
(206) 624-7990  
[mr@leesmart.com](mailto:mr@leesmart.com)